

1 Noel Grefenson
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7 Attorney for Josh Hall

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF OREGON

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 JOSH HALL,

14 Defendant.

Case No.: CR 10-229 BR

MOTION TO CONTINUE TRIAL

15 Defendant, Josh Hall, by and through counsel, Noel Grefenson, hereby moves the
16 Court to continue trial in this matter for a period of 75 days, from December 13, 2011,
17 February 28, 2012. This motion is made under 18 U.S.C. § 3161(h)(7)(A),(B) regarding
18 the Speedy Trial Act, the ends of justice served by a postponement of trial will outweigh
19 the best interest of the public and the defendant in a speedy trial.

20 The parties in this case have reached an agreement to resolve this matter however
21 the details of such agreement are not final. Counsel are working to complete the
22 agreement but require additional time within which to do so and to complete formal entry of
23 Mr. Hall's change of plea. Moreover, sentencing in the co-defendants case is pending and
24 contingencies exist between the proceedings which will affect the details in the parties'
25 agreement.

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1 Mr. Hall is aware of his speedy trial rights, understands those rights and agrees that
2 a continuance of trial is necessary to permit him to formally enter a change of plea
3 pursuant to the terms of his agreement with the Government.

4 Counsel for the Government, Michelle Kerin, has no objection to this motion.

5 This motion finds further support in the Declaration of Noel Grefenson, which is filed
6 together with this motion.

7 Dated: December 2, 2011.

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9 */s/ Noel Grefenson*

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11 Noel Grefenson, OSB No. 88216
12 Attorney for Defendant
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